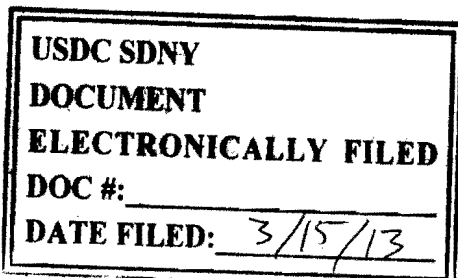


ARNOLD & PORTER LLP

Anthony Boccanfuso  
Anthony.Boccanfuso@aporter.com

+1 212.715.1315  
+1 212.715.1399 Fax

399 Park Avenue  
New York, NY 10022-4690



MEMO ENDORSED

March 13, 2013

VIA HAND DELIVERY

The Honorable William H. Pauley III  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
Room 2210  
Courtroom 11D  
New York, NY 10007

RECEIVED

MAR 14 2013

CHAMBERS OF  
WILLIAM H. PAULEY  
U.S.D.J.

Re: *Thomas W. Charron Jr. v. Sallyport Global Holdings, Inc., et al.* –  
Civ. No. 12-6837(WHP)

Dear Judge Pauley:

We are counsel for Defendants Sallyport Global Holdings, Inc. ("SGH") and Sallyport Global Services, Ltd., as Trustee of the John DeBlasio Charitable Trust for World Peace and Development ("SGS"), in the above-captioned action, and we write with the consent of Plaintiff Thomas W. Charron Jr. ("Charron") and co-Defendants Gian Paul DeBlasio and JPD Private Trust Company, Ltd., as Trustee of the John DeBlasio Charitable Trust for World Peace and Development ("DeBlasio Defendants") to request a one business-day extension of time in which to file a motion to dismiss the First Amended Complaint.

The First Amended Complaint was filed on March 1, 2013, and the current deadline to file a motion to dismiss under the Court's Scheduling Order (Doc. 44) is Friday, March 15, 2013. Due to the additional issues raised in the First Amended Complaint, and the naming of SGS for the first time, SGH and SGS request, with the consent of Charron and the DeBlasio Defendants, subject to the Court's approval, a one business-day extension such that SGH and SGS shall have until Monday, March 18, 2013, to file a motion to dismiss. This request would not affect any other scheduled date. Charron requested previously, with the consent of the then Defendants, a two-week extension of time in which to file the First Amended Complaint and the briefing schedule for the motions to dismiss, which the Court granted.

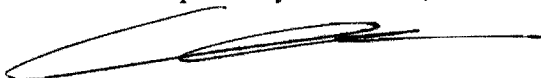
---

ARNOLD & PORTER LLP

---

The Honorable William H. Pauley III  
March 13, 2013  
Page 2

Respectfully submitted,



Anthony Boccanfuso

*Application granted.*

SO ORDERED:

WILLIAM H. PAULEY III U.S.D.J.

3/15/13

Justin S. Antonipillai (admitted *pro hac vice*)  
Colin A. B. Holmes (admitted *pro hac vice*)  
ARNOLD & PORTER LLP  
555 12th Street, NW  
Washington, DC 20004  
Phone: (202) 942-5000  
Fax: (202) 942-5999  
justin.antonipillai@aporter.com  
colin.holmes@aporter.com  
*Counsel for Defendant Sallyport Global Holdings, Inc. and Sallyport Global Services, Ltd., as Trustee of the John DeBlasio Charitable Trust for World Peace and Development*

cc (via electronic mail):

Athanasios Basdekis (admitted *pro hac vice*)  
Brian Glasser (admitted *pro hac vice*)  
James B. Perrine (admitted *pro hac vice*)  
BAILEY & GLASSER, LLP  
209 Capitol Street  
Charleston, WV 25301  
*Counsel for Plaintiff Thomas W. Charron Jr.*

Brian P. Waagner (admitted *pro hac vice*)  
Sarah M. Graves (admitted *pro hac vice*)  
HUSCH BLACKWELL LLP  
750 17th Street NW, Suite 900  
Washington, DC 20006  
*Counsel for Defendants Gian Paul DeBlasio and JPD Private Trust Company, Ltd., as Trustee of the John DeBlasio Charitable Trust for World Peace and Development*